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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: ZIMMER NEXGEN KNEE  
IMPLANT PRODUCTS LIABILITY  
LITIGATION

MDL NO. 2272

This Document Relates to:

Master Docket Case No. 1:11-cv-05468

*Sari McNamee v. Zimmer, Inc., et al.*, Case No.  
1:12-cv-05468

Honorable Rebecca Pallmeyer

**MOTION FOR TRANSFER TO PROPER VENUE**

The plaintiff, Sari McNamee ("Plaintiff"), respectfully moves the court for an order pursuant to 28 U.S.C. § 1406 to transfer the above-captioned case to the United States District Court for the Northern District of Indiana. In support of this Motion, Plaintiff states as follows:

1. On September 26, 2012, Plaintiff filed a complaint against the Zimmer Entities<sup>1</sup> directly into the Zimmer NexGen Knee Implant Products Liability MDL in the District Court for the Northern District of Illinois. For the reasons set forth below, venue does not lie in this District.

2. Plaintiff is a resident of Langley, British Columbia, Canada.

3. Defendant Zimmer, Inc., is a corporation organized and existing under the laws of Delaware, and has its principal place of business located in Warsaw, Indiana.

<sup>1</sup> For purposes of this Motion, the "Zimmer Entities" includes the following entities: Zimmer, Inc., Zimmer

1           4. Defendant Zimmer Holdings, Inc. is a corporation organized and existing under  
2 the laws of Delaware, and has its principal place of business located in Warsaw, Indiana.

3           5. Defendant Zimmer Orthopaedic Surgical Products, Inc. is a corporation  
4 organized and existing under the laws of Delaware, and has its principal place of business in  
5 Dover, Ohio.

6           6. Pursuant to 28 U.S.C. § 1391(b)(1), the United States District Court for the  
7 Northern District of Indiana is a proper venue for this matter.

8           7. Counsel for the Zimmer Entities does not object to the transfer of this matter to  
9 the District Court for the Northern District of Indiana.

10           8. Once this matter has been transferred to the District Court for the Northern  
11 District of Indiana, either party may file a tag-along notice, pursuant to the procedures  
12 established by the Judicial Panel On Multidistrict Litigation, for the transfer of this case back to  
13 the Northern District of Illinois and into the Zimmer NexGen Knee Implant Products Liability  
14 MDL.  
15

16           WHEREFORE, Plaintiff respectfully requests the Court to issue an order transferring the  
17 above-captioned case to the District Court for the Northern District of Indiana.

18 Dated: October 22, 2012

Respectfully Submitted,

20           /s/ Craig Murphy

21           Craig Murphy

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